



DOCKET FILE COPY ORIGINAL

MAR 23 1993

Brenda K. Pennington
Staff Attorney

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 23, 1993

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: CC Docket No. 92-237
Ex Parte Presentation

Dear Ms. Searcy:

On Friday, March 19, 1993, the Cellular Telecommunications Industry Association sent the attached summary of initial and reply comments filed in the above-referenced matter to the Commissioners and their legal advisors, as well as other members of the Federal Communications Commission.

If there are any questions regarding this matter, please do not hesitate to contact the undersigned.

Sincerely,

Brenda K. Pennington
Staff Attorney

Enclosure

No. of Copies rec'd 9
List A B C D E

Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



recycled paper



EX PARTE OR LATE FILED
List A B C D E

RECEIVED

MAR 23 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

**NOTICE OF INQUIRY
ON THE
NORTH AMERICAN NUMBERING PLAN
CC DOCKET No. 92-237**

**SUMMARY OF PHASE ONE INITIAL AND REPLY COMMENTS
FILED WITH THE FCC
DECEMBER 28, 1992
AND
FEBRUARY 24, 1993**

Cellular Telecommunications Industry Association

1133 21st St. N.W., Third Floor, Washington, D.C. 20036 • (202) 785-0081 • FAX (202) 785-0721



recycled paper

SUMMARY OF NUMBERING PLAN COMMENTS

CTIA's summary of comments on the Federal Communications Commission's ("FCC") Notice of Inquiry ("NOI") regarding the administration of the North American Numbering Plan, CC Docket No. 92-237, is divided into two (2) parts.

Part One provides an overview of commentators' positions during the initial comment period on the three (3) issues raised in Phase I of the FCC's NOI. They are: (1) who should administer the North American Numbering Plan ("NANP") and how the administration might

PART ONE

ADMINISTRATION OF THE NANP

There is a clear division in the comments between the local exchange companies' view of the administration of the NANP and that of the interexchange and non-wireline communications providers.

The LECs were supportive of Bellcore's administration of the NANP and favored continuing its management and oversight. For example, both Ameritech and Cincinnati Bell Telephone Company maintained that charges of biased administration are groundless. Moreover, these commentators noted that due to its institutional knowledge and experience, Bellcore may be the only entity that is capable of handling the complex NANP issues.

On the other hand, the interexchange carriers and non-LEC wireless carriers maintain that, under Bellcore's administration, numbering issues are often resolved in favor of the LECs due to their ownership control of Bellcore. These commentators stated that with the introduction of competitive telecommunications services, new entrants (such as cellular providers) are not afforded the same consideration given the LECs. These commentators favor FCC appointment of a neutral, impartial policy forum which addresses industry-wide concerns and needs.

Some commentators did not take a position regarding the administration of the NANP. These commentators, such as GTE and USTA, were neutral as to Bellcore's performance as the Administrator. But all agreed that whether the administration of the NANP remains with Bellcore or is transferred to another entity, the Administrator must be knowledgeable about the numbering scheme and competent to resolve disputes as they arise.

OTHER ISSUES

NUMBERING FOR PERSONAL COMMUNICATIONS SERVICES

Generally, the commentors were in full support of developing a numbering scheme for personal communications services ("PCS"). Many expressed support for the assignment of non-geographic numbering resources for wireless personal communications services, where the number is connected to the person and not to the location. However, there also was agreement that before any action can be taken, PCS needs to be clearly defined. Without a definition of the full panoply of services that PCS comprises, the commentors were unable to provide guidance to the FCC regarding this issue.

Some commentors, such as Pacific Bell and Nevada Bell, however, argued that the NANP can accommodate new technologies like PCS and, therefore, a new numbering scheme is not necessary.

DETERMINING COST AND FEASIBILITY OF LOCAL NUMBER PORTABILITY

Although a majority of the commentors agreed that local number portability is essential to the provision of personal communications services, there was consensus, much like with the numbering issue for PCS, that this issue is not ripe for consideration at this time, with varying reasons expressed. For example, MCI expressed the view that local number portability needs to be more clearly defined before the issue can be explored. GTE stated that the network is not ready to support local number portability even though the Signalling System 7 network is deployed in many areas. On the other hand, MFS argued that local number portability can be achieved through the same technology as 800 number portability.

ANALYSIS OF REPLY COMMENTS

In the reply phase, commentors' views generally did not change from positions taken in the initial comments.

BellSouth took a stronger position, however, regarding Bellcore's administration of the NANP. In its initial comments, BellSouth was neutral concerning Bellcore; whereas, in the reply phase, it favored a new administrator, given growing industry consensus. Likewise, NYNEX and Southwestern Bell reversed their support of Bellcore as the administrator and favored the appointment of a new administrator.

Ohio Interconnection Company and US West filed reply comments only and did not state a position regarding the administration of the NANP. Instead, these commentors addressed the number portability issue.

PART TWO



**INITIAL AND REPLY COMMENTS ON PHASE ONE OF NUMBERING PLAN
PROCEEDING**

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
Ameritech	Supports Bellcore Administration	Argues that Bellcore is the most efficient administrator of the Plan. If a change in administrators is found to be necessary, it argues that the change should not occur until 1996, when significant modifications currently being implemented are scheduled to be completed. Also, any new administrator requires multinational recognition by all 18 nations covered by the Plan. Also, decisions on PCS numbering are premature and should wait until PCS is better defined.
AT&T	Advocates New Administrator	Supports the creation of a "World Zone 1 Numbering Forum" as the administrator of the NANP. Organization would consist of two subdivisions, policy development group which would be open to all who wish to participate, and the Plan Administration group, which would be responsible for execution of the policy group's discussion. Also recommends use of arbitration when conflict arises.
Bell Atlantic	Will Not Oppose New Administrator	States that complaints about Bellcore are unfounded but will not oppose the appointment of a new administrator. Argues that any change should not occur until 1995, after the implementation of interchangeable NPAs. Asks the Commission to announce a policy in favor of eventual number portability for PCS.

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
Bell Canada	Neutral On Bellcore Administration	States it has no strong opinion on who should administer the code, but argues that any change must guarantee improvement. It provides a list of criteria that should be met by any new administrator or modification to the current administration. Asks the Commission to foster the development of an industry agreement on PCS numbering.
BellSouth	Will Not Oppose New Administrator Reply Comments: Supports New Administrator for industry consensus	States that it has found Bellcore an exemplary administrator of the Plan but recognizes the lack of confidence by some segments of the industry in Bellcore's administration. For this reason it will support whatever the Commission decides. If Bellcore continues to administer the Plan, it asks that administration be funded by the entire industry. It supports establishment of a standing industry advisory forum.
CTIA	Advocates New Administrator	Argues for a new industry-wide entity to establish policy for the administration of the Plan. As to the actual execution of the policy decisions, it is neutral as to whether that should be carried out by Bellcore or some new organization.
Centel Corporation	Neutral On Bellcore Administration	Does not object to Bellcore's administration but asks the Commission to establish a meaningful opportunity for the industry to participate in plan decision making.

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
Cincinnati Bell Telephone Co.	Supports Bellcore Administration	Argues that the charges of biased administration are groundless. It states that if changes are found to be necessary, the Commission should merely create an industry advisory board to assist Bellcore. It also states that no change should occur until after interchangeable NPA codes are implemented.
Cox Enterprises, Inc.	Advocates New Administrator	States that Bellcore has favored landline telephone interests in the Plan's administration. Argues for a new neutral administrator and that the Commission should set basic numbering policies. Also, the Commission should require number portability to ensure that PCS is a competitive service and not merely adopt cellular policies for PCS.
GTE	Neutral On Bellcore Administration	Supports inquiry into the Plan's administration by Bellcore, but suggests that there may be ways of correcting any problems short of creating a new administrator. Asks for interim guidance from the Commission until the matter of administration can be fully resolved. Also comments on the importance of number portability to PCS.
Illinois Commerce Commission	Advocates Consideration of New Administrator	States that the competition and conflicts of interest that exist in current environment require the Commission to consider the need for a new administrator. Supports portable numbering for PCS to foster competition.
Information Industry Association	Critical of Bellcore Administration	Criticizes Bellcore's administration of the Plan, but does not advocate a new administrator or specific changes.

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
McCaw Cellular Communications	Advocates New Administrator	Asks that the Plan's administration be transferred to a neutral party. Asks the Commission to recognize that all mobile service providers are eligible to request and obtain non-geographic numbers on a non-discriminatory basis. Also supports local number portability.
MCI Telecommunications	Advocates New Administrator	States that Bellcore's performance as administrator has been unsatisfactory and asks that the Commission delegate administration of the Plan to a separate entity not affiliated with any industry group. Argues for a NANP council to oversee industry deliberations on the Plan and a NANP Registrar to execute ministerial functions.
Metrocall of Delaware	Advocates New Administrator	An administrator should be found that is economically disinterested from numbering users and asks the FCC to require equal non-preferential number availability to all number users. The FCC should require universal number portability within SACs assigned to PCS, and PCS numbering should be assigned through non-geographic SAC codes.
MFS Communications Company (Competitive Access Provider)	Advocates New Administrator	Advocates assigning administration of the Plan to a neutral party, subject to close government supervision similar to what is presently in place for the radio spectrum. It suggests the appointment of the NTIA as the new administrator. Supports number portability.

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
NARUC	Advocates New Administrator	States that Bellcore has been an excellent administrator of the Plan, but that emerging conflicts of interest require transferring administration to a neutral third party. Asks the Commission to develop and achieve industry consensus on assignment guidelines for non-geographic area codes for PCS.
NCTA	Neutral On Bellcore Administration	Advocates that the Commission explore a range of alternatives which would lead to increased input from a wider range of interested parties. Also states that moving Plan administration would be difficult given the number and constantly changing slate of interested parties.
New York Department of Public Service	Neutral On Bellcore Administration	Supports inquiry and views number portability as important. Also requests the formation of an advisory council on issues related to Plan administration and design.
North Pittsburgh Telephone Co.	Advocates New Administrator	States that current system of administration should not be discarded but suggests that Bellcore might spin-off the administration functions to an independent entity. Supports action on PCS numbering but is critical of number portability.
NYNEX	Supports Bellcore Administration Reply Comments: Does not Oppose New Administrator due to industry consensus to transfer administration of NANP from Bellcore to a neutral third party	States that Bellcore is the most qualified party to be the administrator but that it would consider alternative administrators as long as certain minimum criteria are met. Also advocates a more equitable allocation of the costs of maintaining the Plan. Argues against any Commission action with regard to PCS numbering and states that number portability is not presently feasible.

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
<p>Ohio Local Interconnection Exchange Company (Competitive Access Provider)</p> <p>REPLY ONLY</p>	<p>Does not state position regarding NANP Administration— Addresses number portability</p>	<p>CAP which provides private line services in competition w/LEC, but no switched services. Encourages FCC to initiate NPRM on number portability to guide in business plans for future providing switched services.</p>
<p>Pacific Telesis</p>	<p>Supports Bellcore Administration</p>	<p>Supports continued administration by Bellcore, but with the creation of an industry advisory council.</p>
<p>Paging Network, Inc.</p>	<p>Advocates New Administrator</p>	<p>Supports the proposal by Telocator to establish a new, open, single industry forum in which all numbering plan issues would reside. States that the forum should be run in the same manner as any standards setting forum.</p>

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
Southwestern Bell	<p>Supports Bellcore Administration</p> <p>Reply Comments: Advocates Single Numbering Forum</p> <p>No longer specifies Bellcore as favored administrator, but states that Bellcore, and AT&T's previous administration, has not been surpassed by any other country or association.</p>	<p>While supporting Bellcore's continued administration of the Plan, the comments also support the creation of an industry advisory panel to assist the Commission and Bellcore. The comments also state that the costs of administration should be allocated among all resource recipients and that PCS numbering and number portability should not be considered in the instant proceeding.</p>
Sprint	Advocates New Administrator	<p>Comments state that the only fair method of administering the Plan is through the formation of a policy making body which is open to all interested parties. Also states that neither local number portability nor personal numbering plans should be adopted.</p>
Telco Planning, Inc.	Advocates New Administrator	Advocates a neutral administrator funded by all industry segments.
Teleport Communications Group (Non-LEC Local Common Carrier)	Advocates New Administrator	<p>Advocates a transfer of the administration functions to an independent body under the control all telecommunications common carriers offering local switched telecommunications services. Local number portability should be implemented as soon as possible.</p>
Telocator	Advocates New Administrator	<p>While the comments distinguish between the policy making functions and the ministerial functions of the administrator, they advocate transferring both functions to a neutral entity composed of industry wide membership and funded by the members. The comments ask the Commission to state that all mobile service providers are eligible to obtain non-geographic codes.</p>

COMMENTOR	POSITION ON ADMINISTRATOR	COMMENTS
USTA	Neutral on Bellcore Administration	Comments discuss various Plan administration alternatives, including modifications to current system, without endorsing any one in particular. Comments advocate, however, that no changes be completed until plans for CIC expansion and local number interchangeability are implemented.
US West REPLY ONLY	Does not state position on Bellcore Administration Addresses Local Number Portability	Generally supports local number portability, but argues that without market data, it is difficult to determine its cost and feasibility.
Unitel Communications (Canadian Interexchange Carrier)	Advocates New Administrator	Comments argue that administration of the Plan should not be dominated by one industry segment and that an all-industry steering committee should be formed.
Vanguard Cellular Systems, Inc.	Advocates New Administrator	Complains of the lack of a coherent, consistent system for the allocation of NPA and NXX codes, citing CTIA letter. Asks for independent non-profit organization to oversee the Plan's administration.
Whidbey Telephone Company	Critical of Bellcore Administration	Acknowledges that Bellcore's administration has worked reasonably well up to this point, but that Bellcore may have become too involved with its own interests and those of its owners.